

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In Re:	:	
	:	
THEODORE A. GREEN	:	
xxx-xx-6464	:	:CHAPTER 13
Debtor.	:	:CASE NO. 20-12303-AMC
Elizon Master Participation Trust I, US Bank	:	
Trust National Association, as Owner	:	
Trustee	:	
Movant,	:	
v.	:	
THEODORE A. GREEN	:	
Debtor,	:	
And	:	
SCOTT F. WATERMAN,	:	
Trustee,	:	
Respondents.	:	

CERTIFICATION OF DEFAULT

I, Emmanuel J. Argentieri, Esquire of Attorney, Romano Garubo & Argentieri, attorneys for Elizon Master Participation Trust I, US Bank Trust National Association, as Owner Trustee (hereinafter "Movant") hereby certify that Debtor has defaulted upon the terms of the Stipulation settling the Motion for Relief filed with the Court on April 13, 2022.

1. It is further certified that Notice of said default was mailed to the Debtor and Debtor's attorney via regular mail on or about April 18, 2024. **(Please see attached copies of letters attached hereto as Exhibit A).** On April 30, 2024, Notice of said Default was emailed to

Debtor's attorney. Subsequent to said Notices, Debtor failed to cure the default as set forth in detail in the aforesaid Notices.

2. Pursuant to the foregoing, Movant contends that cause exists to grant it relief from the Automatic Stay.

3. Movant has cause to have relief from the Automatic Stay effective immediately and such relief should not be subject to the fourteen-day period set forth in Bankruptcy Rule 4001(a)(3), as Movant will incur substantial additional costs and expenses by the imposition of said fourteen-day period.

WHEREFORE, Movant respectfully requests that the Court enter an Order which grants it relief from the Automatic Stay, along with all other relief the Court deems just and equitable under the circumstances.

ROMANO GARUBO & ARGENTIERI
Attorneys for Movant

By: /s/ Emmanuel J. Argentieri
Emmanuel J. Argentieri, Esquire
PA Attorney ID No. 59264

Dated: November 13, 2024

ROMANO GARUBO & ARGENTIERI
Emmanuel J. Argentieri, Esquire/59264
52 Newton Avenue, P.O. Box 456
Woodbury, New Jersey 08096
(856) 384-1515
eargentieri@rgalegal.com